

## Affidavit

County of Lorain

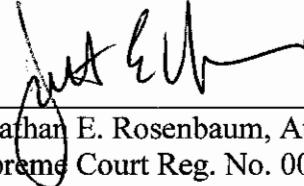
SS:

State of Ohio

Now comes the undersigned, Jonathan E. Rosenbaum, who being duly sworn states as follows:

1. The following is a true and accurate record of my time spent in and expenses incurred in prosecuting Jane Doe, et al v. Boland, USDCt ND Ohio Case No. 1:07cv2787;
2. \$200.00 per hour has been my usual and customary hourly rate for the past several years; and
3. \$200.00 per hour is a reasonable fee for legal services in Lorain County, Ohio;

Further Affiant sayeth naught.

  
\_\_\_\_\_  
Jonathan E. Rosenbaum, Attorney

Supreme Court Reg. No. 0021698

Sworn to and subscribed before me this 24<sup>th</sup> day of April, 2009.

Time and Expenses

Client: Bloom / Rate: \$200.00

Date	Activity/ Expense	Time/Amount
9-1-06	Background investigation re Boland Attempt FOIA	0.75 1.25
9-9-07	Obtain and Read SW, Diversion Agreement	2.0
9-10-07	Res re Priv. and Cause of Action Res and Draft complaint;	3.25 7.0



JENNIFER ANDRESS  
Notary Public  
State of Ohio  
My Commission Expires 3-27-13

9-11-07	Research (computer and law library) and draft federal complaint	2.5
9-13-07	Prepare Summons, Case Desig. Form, File lawsuit	1.5
10-21-07	Download and read Comp. res re state of limitation; print out Motion to Dis And Exs; Res rules regarding time for reply	3.25
10-24-07	Computer and library research for Br In Opp	3.75
10-25-07	Draft Br in Opp	8.0
10-26-07	Edit and Proof Br in Opp; Res	3.75
12-17-07	Speak with Istock Atty	0.25
12-19-07	Prepare Initial Disc Disclosure; Speak with Deft	1.5
12-21-07	Receive Third Party Complaint and Ans w/ cc; Computer Res re dismissal	1.25
12-23-07	Complete initial disclosure and est. costs and fees	4.0
12-26-07	Speak to Deft re planning order; Work on Motion to Dismiss; Draft Planning Meeting Report	8.0
12-27-07	Finalize and serve Motion to Dismiss	5.25
1-3-08	Finalize and send Planning Meeting Report with letter	0.50
3-3-08	Meet with S/A Sullivan and review images1/2 travel time	1.75
3-4-08	Work on Disc Req to Deft; Review Docs and filings	5.0
3-5-08	Finalize Disc Req; Not of Serv; File and Serve	1.25
4-29-08	Read Emails re Discovery Response from Deft; Draft and file Notice of Deemed Admissions and Exhibits	2.25
4-30-08	Draft and send R37 letter; issue and serve 23 subs	6.5
5-2-08	Read disc Response; Draft, Research, File Br in Opp to Mot to w/d Deemed Admissions	3.25
5-5-08	Draft and email proposed joint SC report; Remind Clients of SC	1.0
5-12-08	Attend SC; Meet with clients Travel 60 mi	1.75
5-18-08	Review Court rulings and entries after download; Email Correspondence with Judge Pike and Atty Clark; Letter to Portage County Pros office	1.25
6-12-08	Travel to Cleveland (1/2 time) meet with SA Sullivan; review discovery	1.5
7-9-08	Travel to Cleveland to meet with SA Sullivan to open disc	1.5
7-10-08	Travel to Cleve for Sc; Attend SC; Meet with Clients, Speak with SA Sullivan; Draft sub ltr to USA off and FBI; Draft Sub; mail	3.25
7-17-08	Draft Res to Motion to strike	3.5
7-17-08	Rework Motion to Strike Res and file , Create Affidavits; Call Hamilton County PO and Ok USAO; create and serve 2 subs	6.0
7-23-08	Travel to FBI to Prepare for Depo and surrender Summit County CD	3.25
7-28-08	Prepare for depo.	6.25
7-29-08	Attend Depo of Deft	5.5
8-13-08	Draft serve and file Mot to Compel	1.0
8-20-08	Email Correspondence with Deft; res and prepare Aff Affecting Real Estate	1.25
8-21-08	Travel to Cleveland and File aff affecting Real Estate	1.75
	Attend and prepare for Depos of adult Plaintiffs	2.0

4-21-09	Draft Mot for SJ	1.75
4-22-09	Draft Mot for SJ	4.0
4-23-09	Finalize Mot for SJ	<u>3.5</u>
		127.75

127.75 hrs. x \$200.00/hr = \$25,550.00

#### Payments and Expenses

3-17-08	Travel to USA Office 60 mi plus \$5.00 parking	
9-13-08	Filing Fee	\$350.00
1-11-08	60mi and parking	\$7.00
3-3-08	30mi (1/2) travel	
5-1-08	CM for Subs	\$119.83
5-12-08	Parking \$6.00	
6-12-08	60mi	
7-9-08	30 mi	
7-10-08	60 mi and \$6.00 parking	
7-18-08	CM to Boeing and Tulsa	\$10.98
7-23-08	60 mi	
7-29-08	60mi and \$6.00 parking	
8-15-08	M&H	\$272.00
8-21-08	Recording Fee \$60.00, parking \$2.25, 60 mi	

540.0 mi x \$0.45= \$243.00

Expenses: \$838.86